

Message

From: BECKHAM, LISA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]
Sent: 8/10/2018 6:54:26 PM
To: Raju Bisht [rbisht@navajo-nsn.gov]
Subject: RE: TransWestern Leupp Compressor Station Title V Renewal
Attachments: TWP_Leupp PreDraftSOB lkb.docx

Thanks Raju! I knew this issue sounded familiar. So, I did some digging here. I do not think there is a separate EPA approval for the 8,760 to 9,000 hour increase. I believe the intent was to approve it as part of the part 71 renewal. I found a pre-draft of the SOB that was sent to us that said this:

In the Part 71 renewal application submitted on November 17, 2009, the permittee requested an increase in the operating hours for the two electric generator engines combined to 9000 hours per year to allow for instances where both engines run simultaneously during the engine start-up sequence and during brief periods of maintenance. NNEPA and U.S.EPA agree to increase the combined operating hours of the two electric generator engines.

It looks like our comment back was that this was not a sufficient explanation, and recommended the language that now appears in the SOB. This language seems misleading though because it implies there is a written determination from EPA. But, I do not think that happened as I also could find no such record (or if we did it was informal in an email and I don't have it). Based on what I have here, it is my understanding we consulted with NNEPA on this change and agreed that the request from the applicant didn't trigger PSD.

To prevent further confusion, I recommend the attached edits. Let me know what you think. I don't have any other comments beyond this issue.

I'm out the rest of the afternoon, but will be in on Monday.

Lisa

From: Raju Bisht [mailto:rbisht@navajo-nsn.gov]
Sent: Friday, August 10, 2018 9:00 AM
To: BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>
Subject: FW: TransWestern Leupp Compressor Station Title V Renewal

Hi Lisa,

We were out on inspections all day yesterday and I could not get back to you. Please refer to my email below. You replied to this on Dec. 28 saying you would think about this a little more and get back. During our call in January, the girls said they would look for any requests from the Facility back in 2010 to increase the operating hours from 8760 to 9000. So, I am assuming it was only in the permit renewal application to NNEPA and NNEPA in consultation with Region 9 granted the request to increase the total number of hours from 8760 to 9000 hours back in 2010 when the permit was issued but kept the clause about 24 transitions with each lasting 5 mins or less intact. This contradicted what was requested because this still restricted the operating hours to 8760 +2, and the other clause granting 9000 hours of operations made little sense. Ever since, the facility has raised this issue at every inspection, saying that 24 transitions with the duration of each lasting 5 min is just not enough and that granting 9000 hours made little sense. I have always told them that we would address this during the permit renewal. Looking back in their annual and semi-annual reports, they are always having to report a lot of deviations. There are typically over 35 transitions a year. When it is a maintenance or repair issue which is frequent, the transition lasts an hour or more.

Since, I did not hear from you and it looked like the request to increase the total operating hours to 9000 hours was approved by NNEPA back in 2010, I felt that NNEPA could grant this request from the facility as well. There is no point in having a condition in the permit if the facility is never able to comply and the condition is not coming from any regulation or PSD. There is no increase in emissions as the total allowable hours 8760+240 is still 9000 hours. I don't know if I am making myself clear here. If you feel that TWP should submit a separate application to Region 9 with this request and that Region 9 would have to approve it before it can be incorporated into the Title V, let me know and I will ask them to do that. I can call you if you want to discuss this further.

Thank you.

Raju

From: Raju Bisht

Sent: Thursday, December 14, 2017 4:56 PM

To: 'BECKHAM, LISA (BECKHAM.LISA@EPA.GOV)' <BECKHAM.LISA@EPA.GOV>

Cc: 'Tennille B. Begay' <tbbegay@navajo-nsn.gov>; Prashanth Subburam <psubburam@navajo-nsn.gov>

Subject: TransWestern Leupp Compressor Station Title V Renewal

Hi Lisa,

I have attached the permit documents in chronological order for simplicity.

1. In the first Title V that was issued by EPA on 04/26/2000, there seems to be no specific requirements for Units 301, 302, 303, 321, and 322.
2. In the Nov 2001 Modification and 2001 Title V issued by EPA, the facility was permitted to replace units 301,302,303 with a single turbine unit 304 and replace units 321 and 322 with units 323 and 324. This did not trigger PSD because the NOx emissions actually decreased from 1479 tpy to 239 tpy. Condition II.B.2 required that Emission Units 323 and 324 not operate simultaneously. Condition II.B.3 required that the combined hours of operation of Units 323 and 324 not exceed 8,760 hours in any 12 month period. I just pulled these first three documents from the web and am assuming these were the final documents.
3. In the first Title V permit issued by NNEPA, Condition II.B.2 was replaced by Condition II.B.3 which stated that Units 323 and 324 not operate simultaneously except during transition from one generator to another, but there were not to be more than 24 transitions in any 12 month period and each transition to last less than 5 minutes. This must have been a request from the facility, but I am not sure. This basically allowed for two more hours (24*5 min) on top of the 8760 total operation hours required by Condition II.B.4
4. In the 2010 renewal, the facility requested to increase the operating hours from these generators from 8760 to 9000 hours. From the discussion in the 2010 SOB, document 5, it looks like this request was granted by EPA. This increased the NOx emissions from 239 to 254 tpy and the facility was now a PSD major. I do not have access to the request letter from the facility nor the response from EPA regarding this. I asked the facility for these documents, but they don't seem to have any of it.
5. Now, in their renewal application, the facility is requesting to increase the number of transitions from 24 in a 12 month period to 48 during a calendar year and to delete the clause about each transition lasting less than 5 minutes to each transition's overlap period to last no more than 240 hours per year, but I think they mean up to 24 transitions in a calendar year with the total duration of all the transitions to be less than 240 hours. Ever since I got on board and going to the facility for inspections, they have always been raising this issue. They say 5 minutes is just not enough due to maintenance issues and that they are having to report too many deviations.

How do you suggest we deal with this issue. I know the PTE will not increase as the total number of hours would still be 9000 or less (8760+240). I am assuming since the request in 2000 to increase the total hours from 8760 to 9000 was granted by EPA, this change would also have to be approved by EPA. Do you think I should ask the facility to submit this request to EPA in writing citing the reasons and time rather than just a simple cap of 240 hours per year. Please let me know what you think. The holidays are coming up and there is no rush. Just

wondering if this was also something that was requested back in 2010 and denied or something. I don't know if you have access to documents from back then.

Thanks. Raju